UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In Re: OpenAI, Inc. Copyright Infringement Litigation

This Document Relates To:

Case No. 1:23-cv-11195-SHS-OTW

Case No. 1:24-cv-03285-SHS-OTW

Case No. 1:24-cv-04872-SHS-OTW

Case No. 1:23-cv-08292-SHS-OTW

Case No. 1:23-cv-10211-SHS-OTW

Case No. 1:25-cv-03482-SHS-OTW

1:25-md-3143-SHS-OTW

DEFENDANT MICROSOFT CORPORATION'S JUNE 26, 2025 TECHNOLOGY TUTORIAL DEMONSTRATIVES



In re: OpenAI, Inc. Copyright Infringement Litigation 25-md-3143 (SHS) (OTW)

Microsoft's Technology Tutorial

Agenda

- 01. Microsoft's Support of GPT Development
- 02. M365 Copilot Product Demonstration
- 03. How Grounding (Retrieval-Augmented-Generation) Works
- 04. Responsible Al
- 05. How New Consumer Copilot Differs from M365 Copilot and Bing Chat

Microsoft's Support of GPT Development

Microsoft's Support of GPT Development

Capital Investment Training Infrastructure

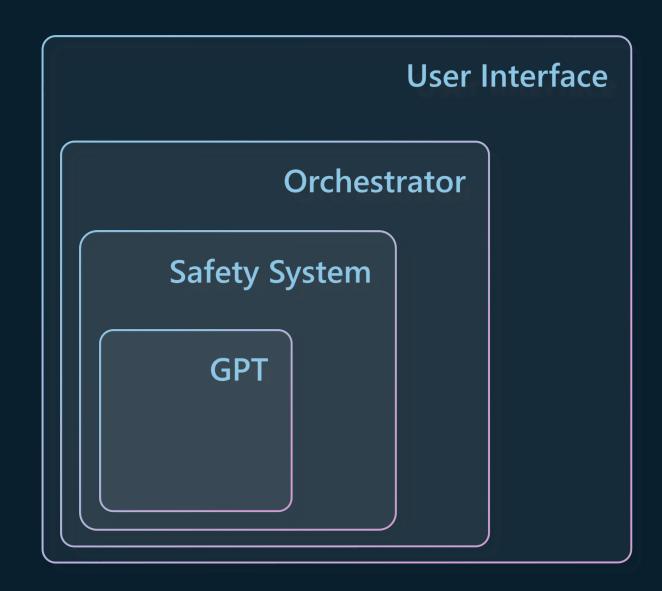
- Tens of thousands of GPUs
- High bandwidth, global infrastructure scaling on demand
- Massive parallel training architecture





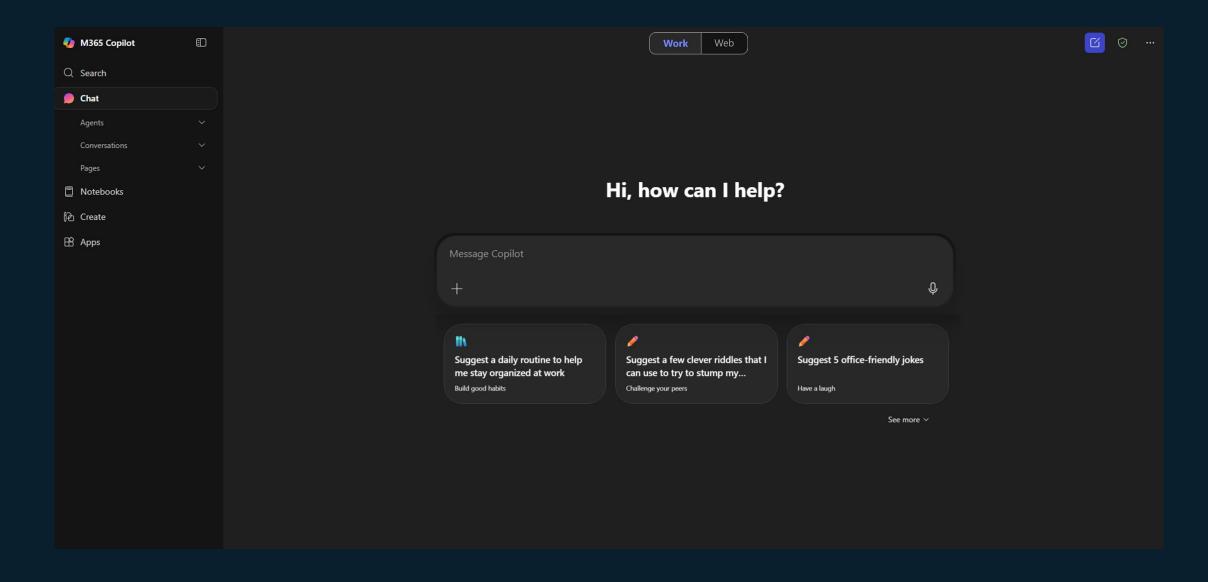






M365 Copilot Product Demonstration





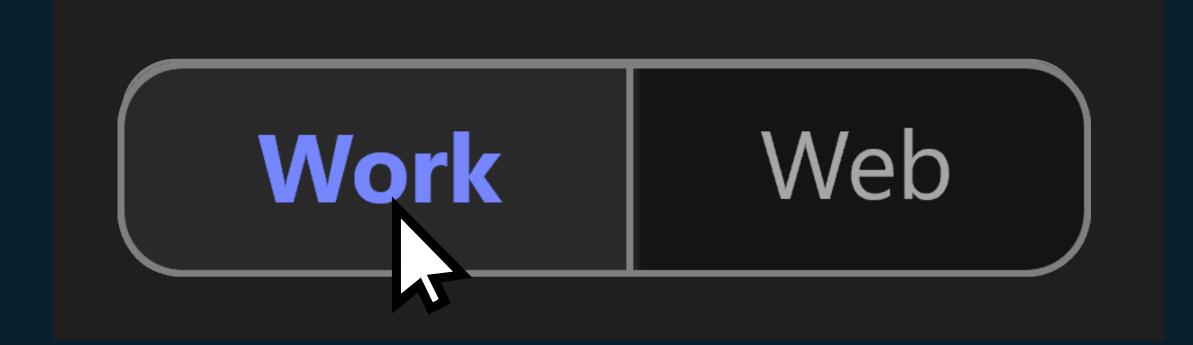








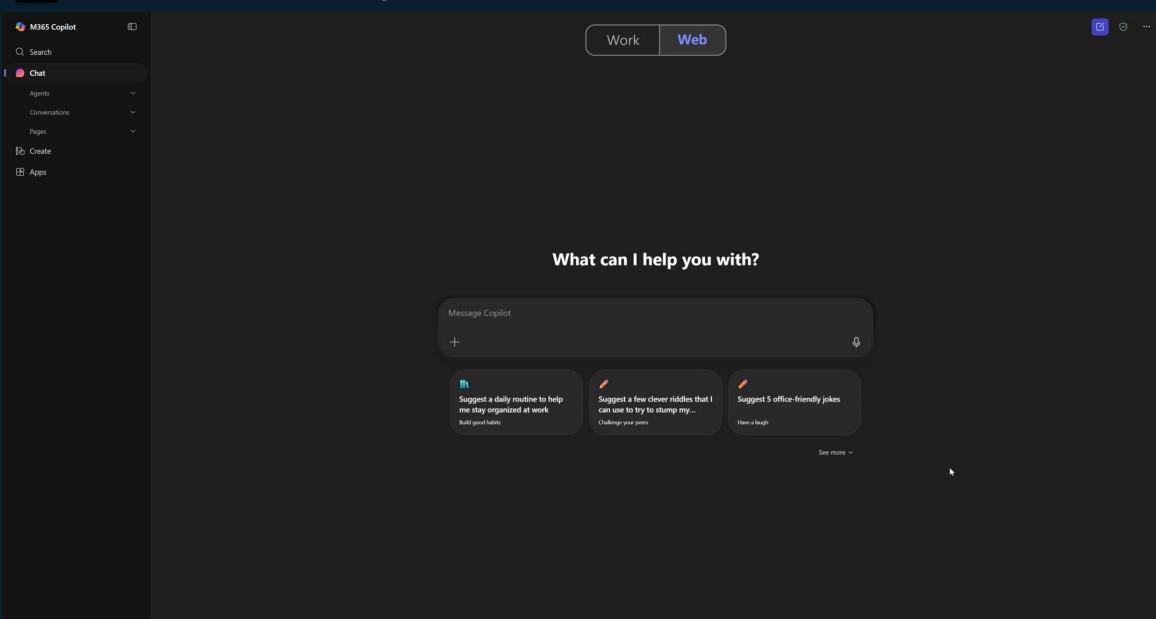




Example 1 – Ideation



Ideation Prompt



Ideation Prompt

What can I help you with?

what is a good team name for a two-person team in a trivia competition? + III Suggest a daily routine to help Suggest a few clever riddles that I Suggest 5 office-friendly jokes me stay organized at work can use to try to stump my... **Build good habits** Challenge your peers Have a laugh See more ~



Document 414

Filed 06/27/25



Ideation Prompt

what is a good team name for a two-person team in a trivia competition?



•••

-



Ideation Prompt

Here are some fun and clever team name ideas for a two-person trivia team:

© Clever & Punny

- · Quiztopher Nolan
- Smarty Pints
- · The Know-It-Alls
- · Trivia Newton John
- · Let's Get Quizzical

Brainy & Bold

- Double Jeopardy
- · The Think Tank
- Mind Over Matter
- Fact Checkers
- The Brain Trust

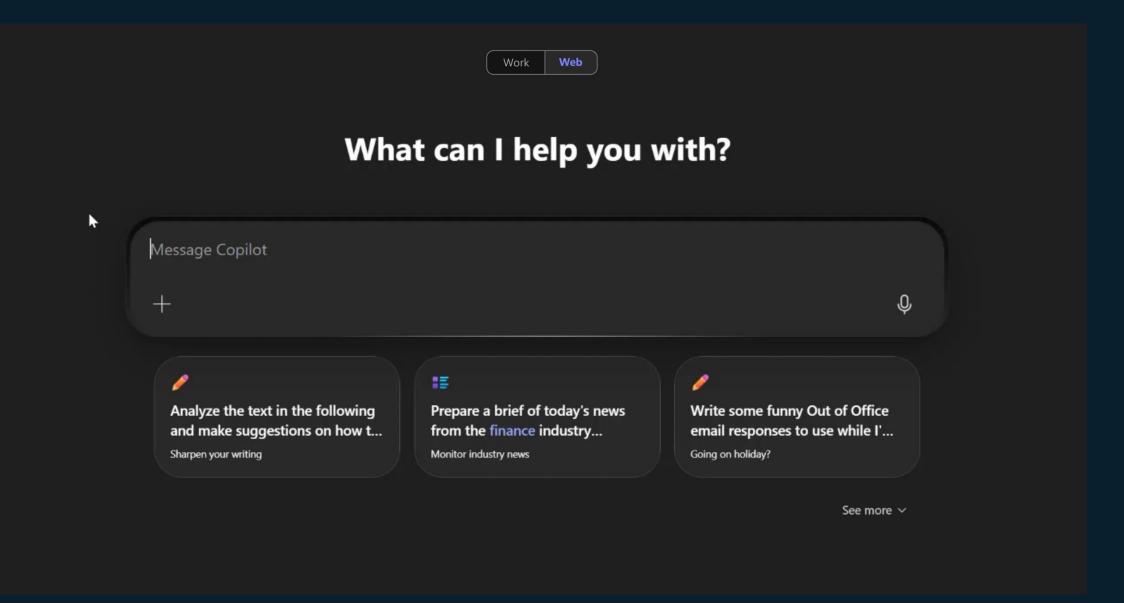
Pop Culture Inspired

- Dynamic Duo
- The Quizzard of Oz
- · Sherlock & Watson
- The Inquizitors
- 2 Fast 2 Curious

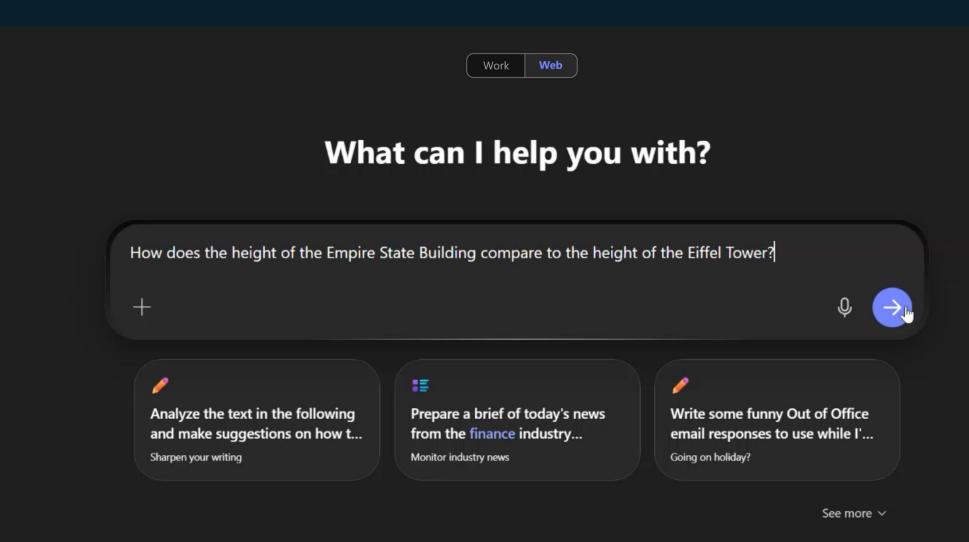


Example 2 – Knowledge Task with Grounding

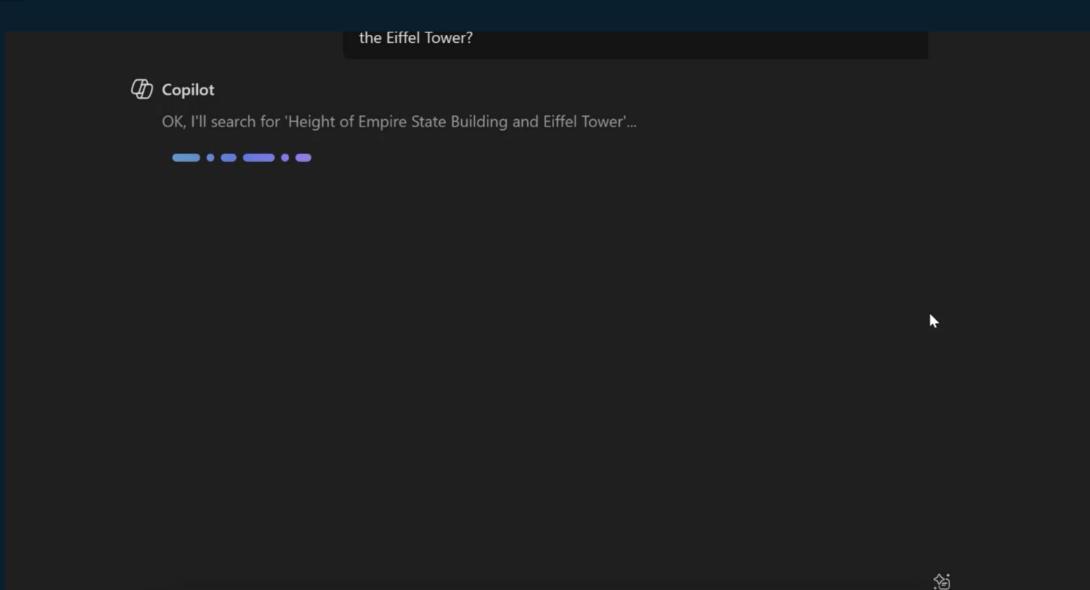












the Eiffel Tower?



The **Empire State Building** and the **Eiffel Tower** are both iconic landmarks, but they differ significantly in height and structure:

Height Comparison

- · Empire State Building:
 - Total height (including antenna): 443.2 meters (1,454 feet)
 - Roof height (excluding antenna): 381 meters (1,250 feet) 1 3 2
- · Eiffel Tower:
 - Total height (including antennas): 330 meters (1,082 feet) 1 3 2

Summary

The Empire State Building is **about 113 meters (or 372 feet) taller** than the Eiffel Tower when measured from base to tip, including antennas.

Would you like a visual comparison or more details about their architecture or history?

Show me a visual comparison.

Tell me about their construction history.





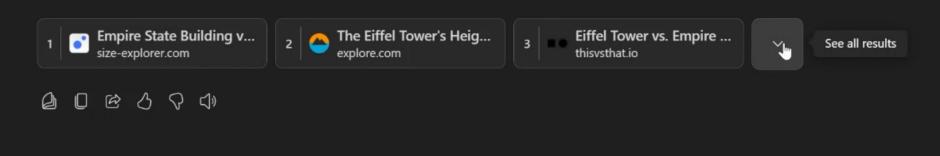
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Would you like a visual comparison or more details about their architecture or history? Sources (i) Citations **Empire State Building vs Eiffel Tower - Size Explorer** size-explorer.com The Eiffel Tower's Height Compared To Other Iconic Structures explore.com Eiffel Tower vs. Empire State Building thisvsthat.io More Charting the Tallest Buildings in the World Side by Side (infographic) elitetravelblog.com **Empire State Building - Wikipedia**

Show me a visual comparison.

Tell me about their construction history.



Tell me about their construction history.



Simple Knowledge Task with Grounding

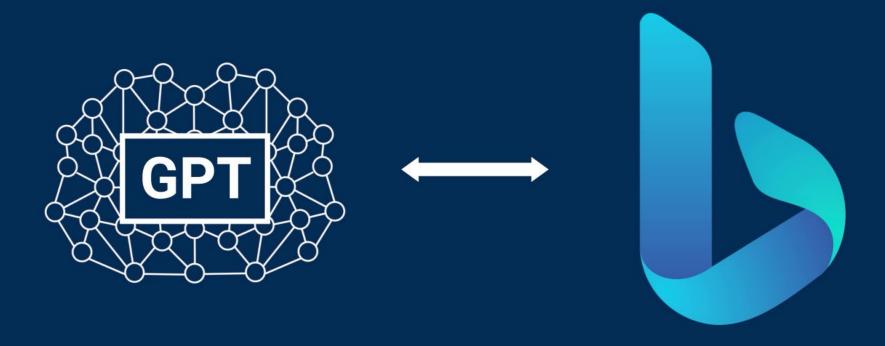
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Show me a visual comparison.

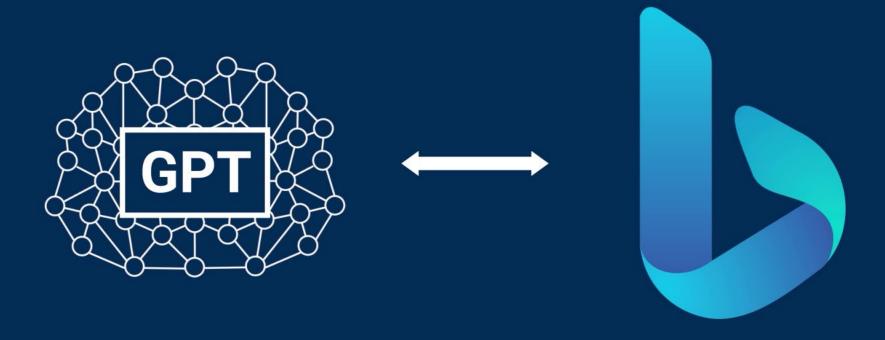
How Grounding Works



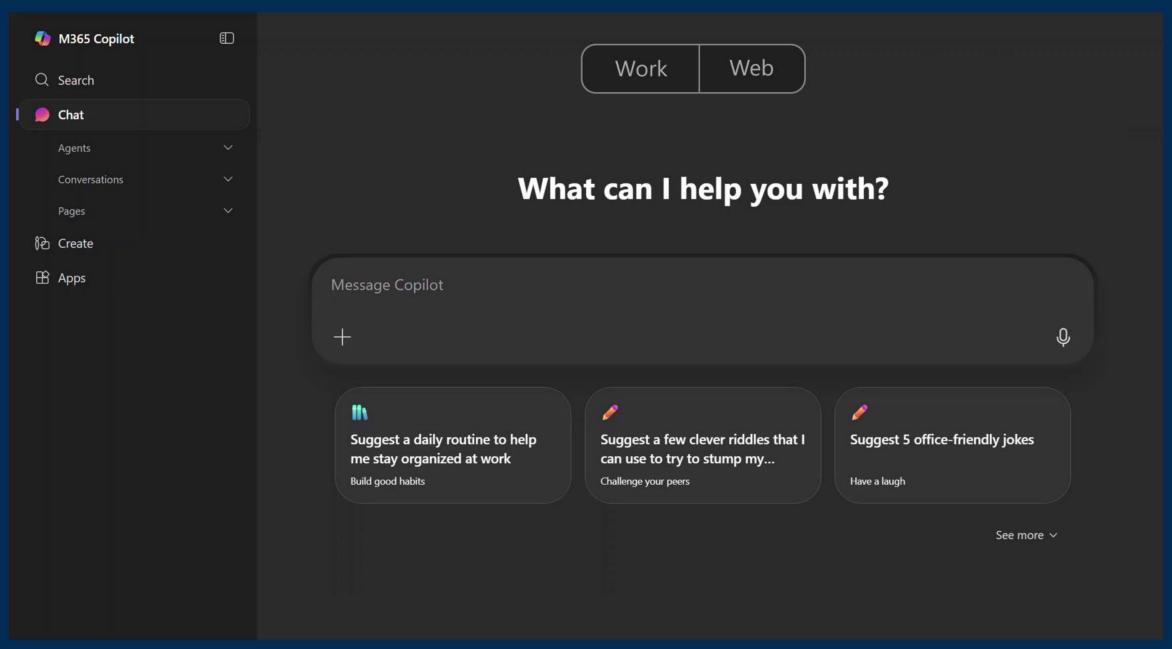
retrieval-augmented-generation

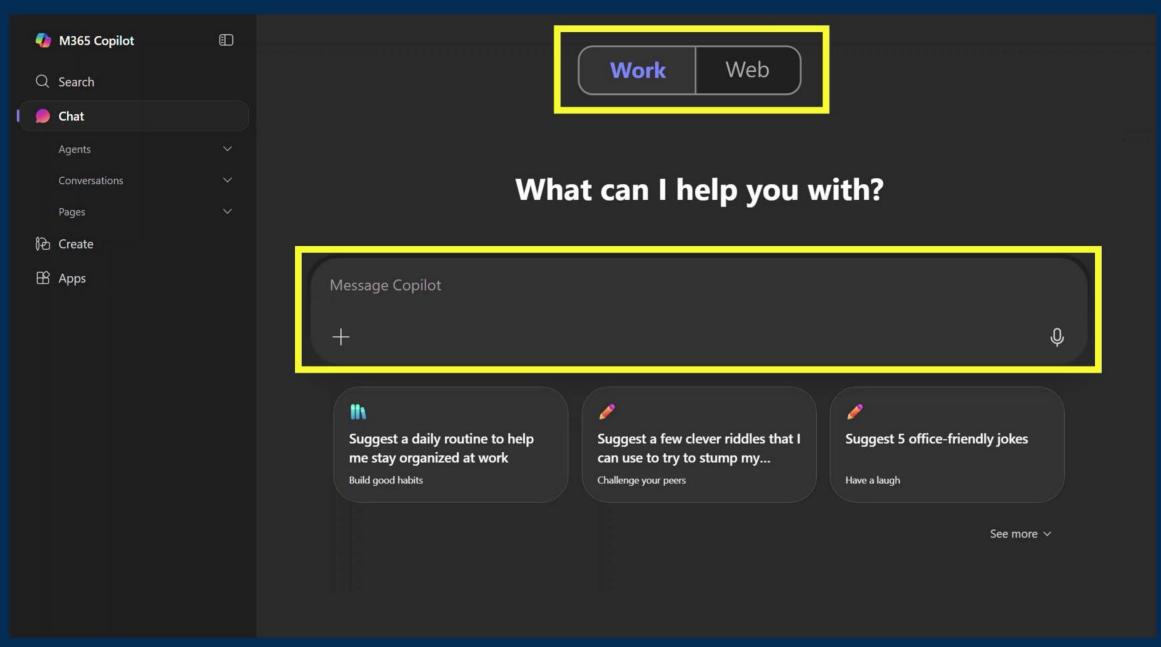


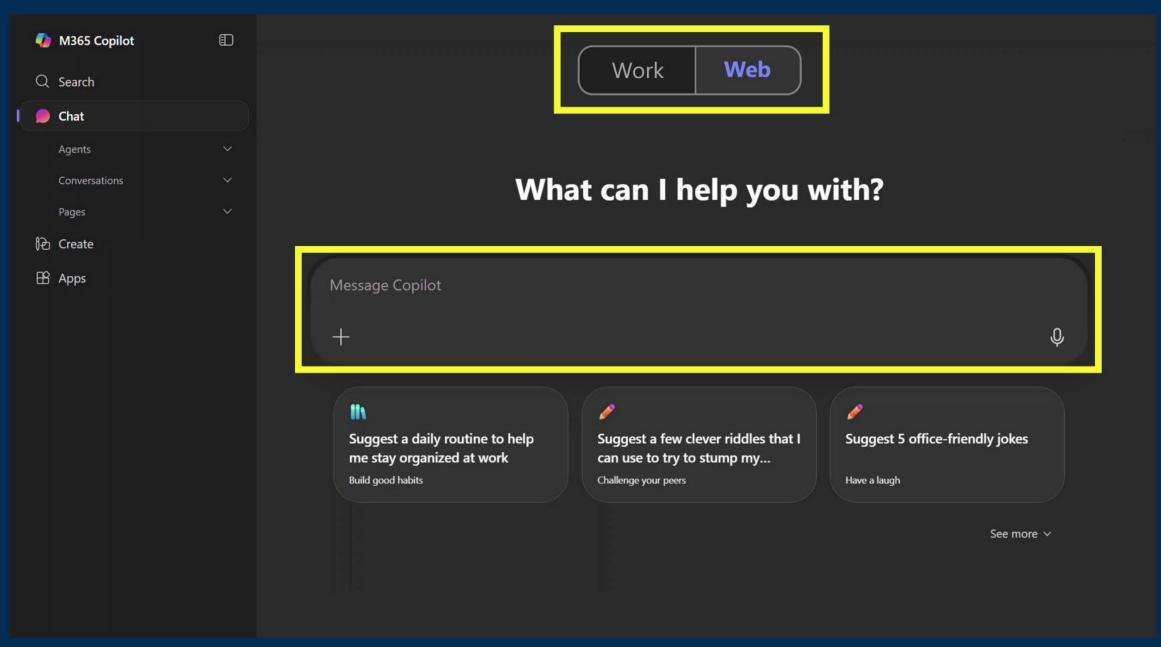
Grounding

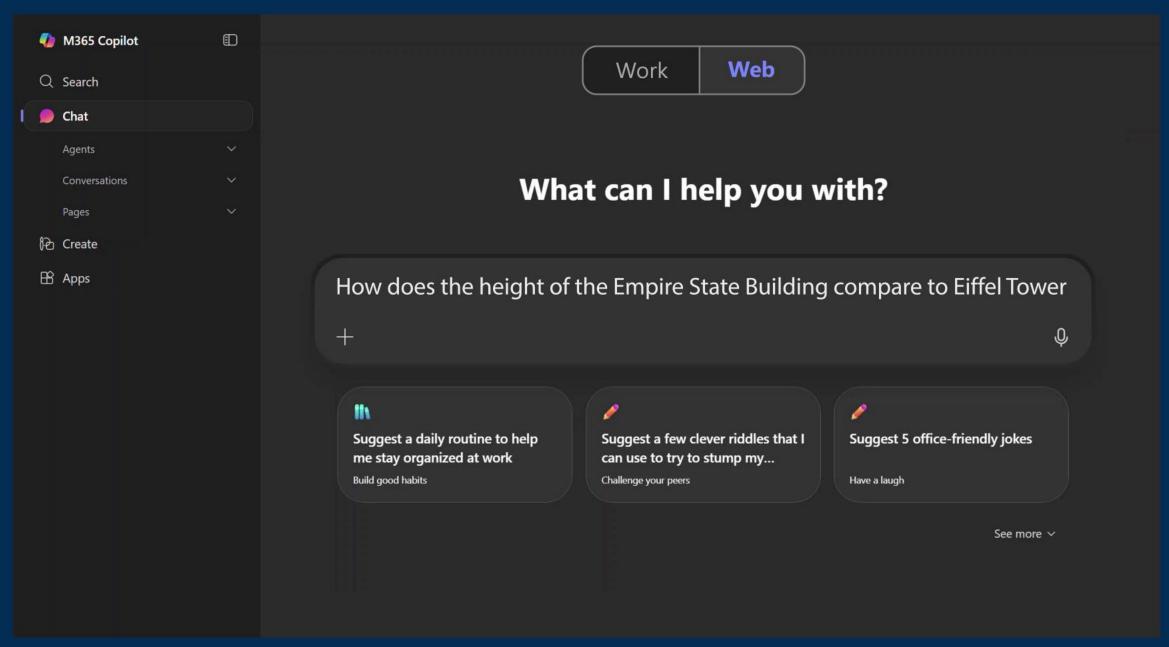






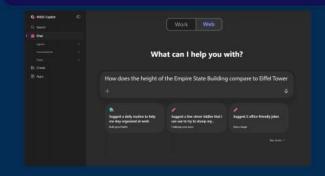






User query & conversation context

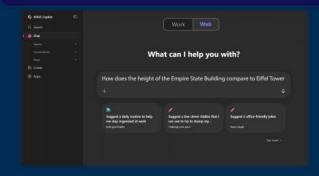
How does the height of the Empire State Building compare to Eiffel Tower

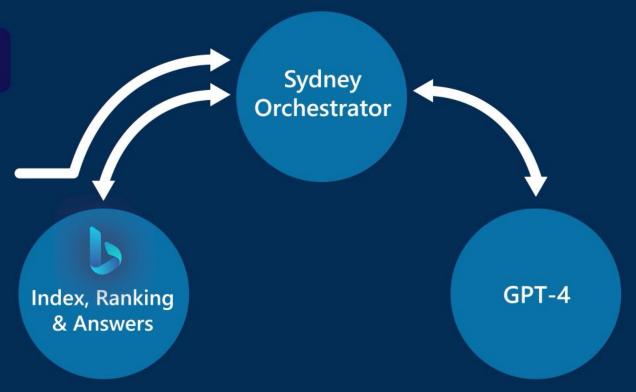




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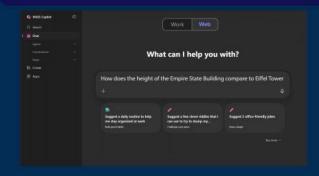
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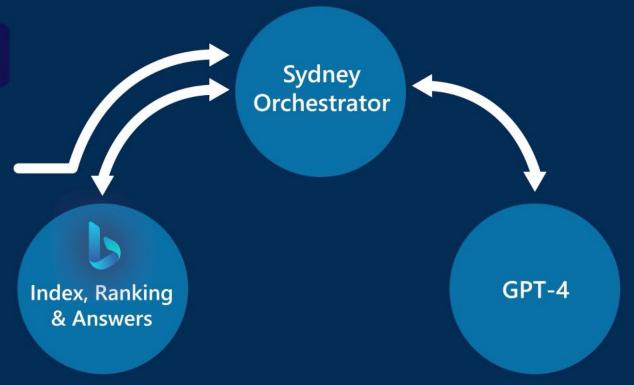




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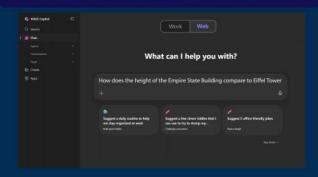


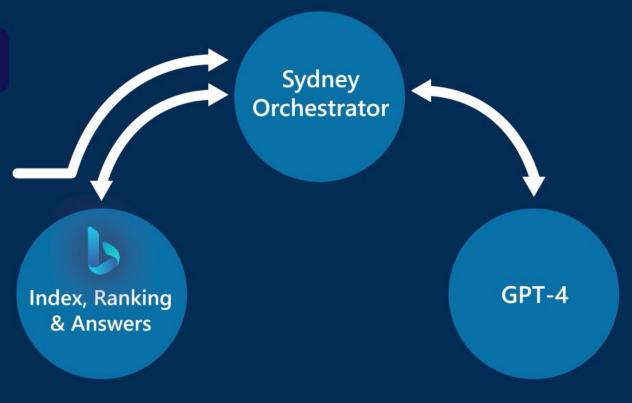
(Sydney searches for 'height of Eiffel Tower')

(Sydney searches for 'height of Empire State Building')



How does the height of the Empire State Building compare to Eiffel Tower





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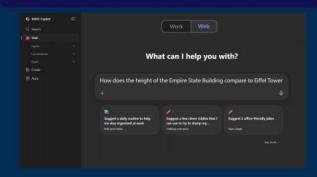


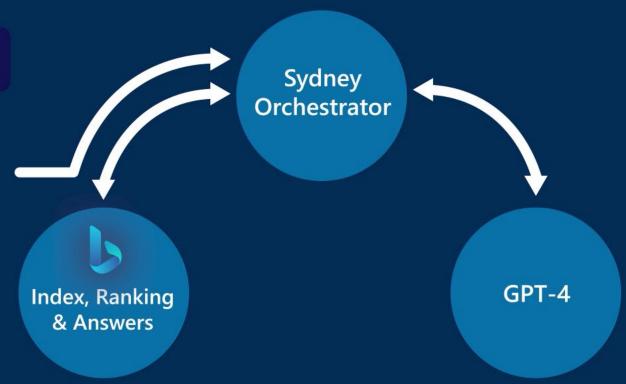




- 3 Eiffel Tower vs. Empire State...
- Charting the Tallest Buildings in the... elitetravelblog
- Empire State Building Wikipedia en.wikipedia.org

How does the height of the Empire State Building compare to Eiffel Tower



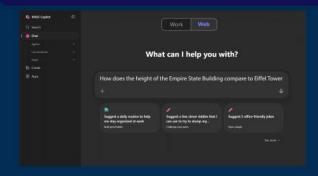


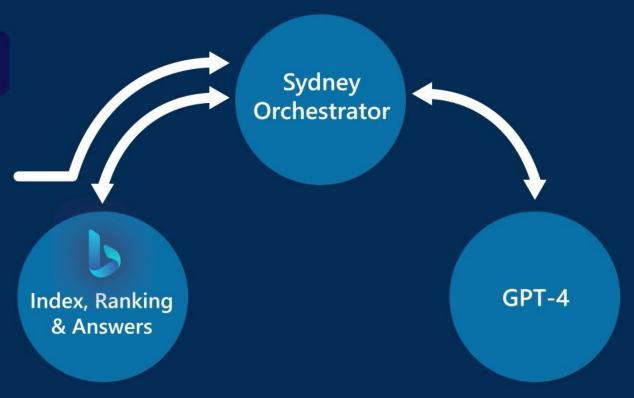
(Sydney searches for 'height of Eiffel Tower')

(Sydney searches for 'height of Empire State Building')



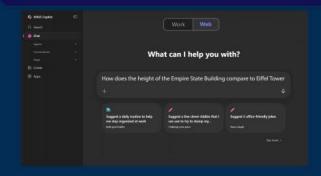
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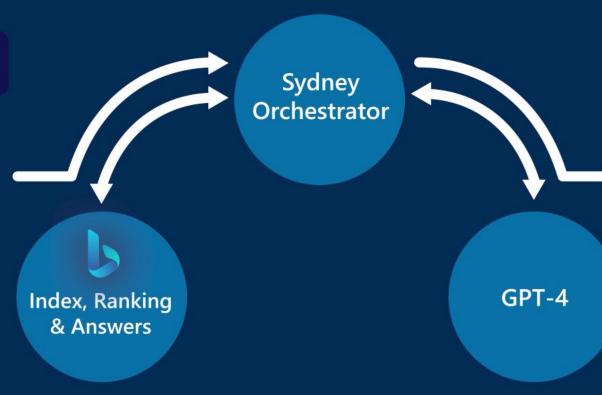




"Grounding Material"

How does the height of the Empire State Building compare to Eiffel Tower

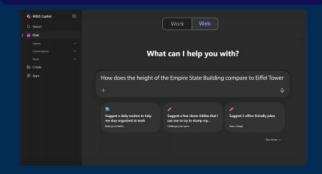




"Responding" or "Generating" Model



How does the height of the Empire State Building compare to Eiffel Tower





The Empire State Building and the Eiffel Tower are both iconic landmarks, but they differ significantly in height and structure.

Height Comparison

Empire State Building

- Total height (including antenna): 443.2 meters
 Eiffel Tower
- Total height (including antennas): 330 meters

Learn more: <u>1</u>, <u>2</u>, <u>3</u>.

"Responding" or "Generating" Model

GPT-4

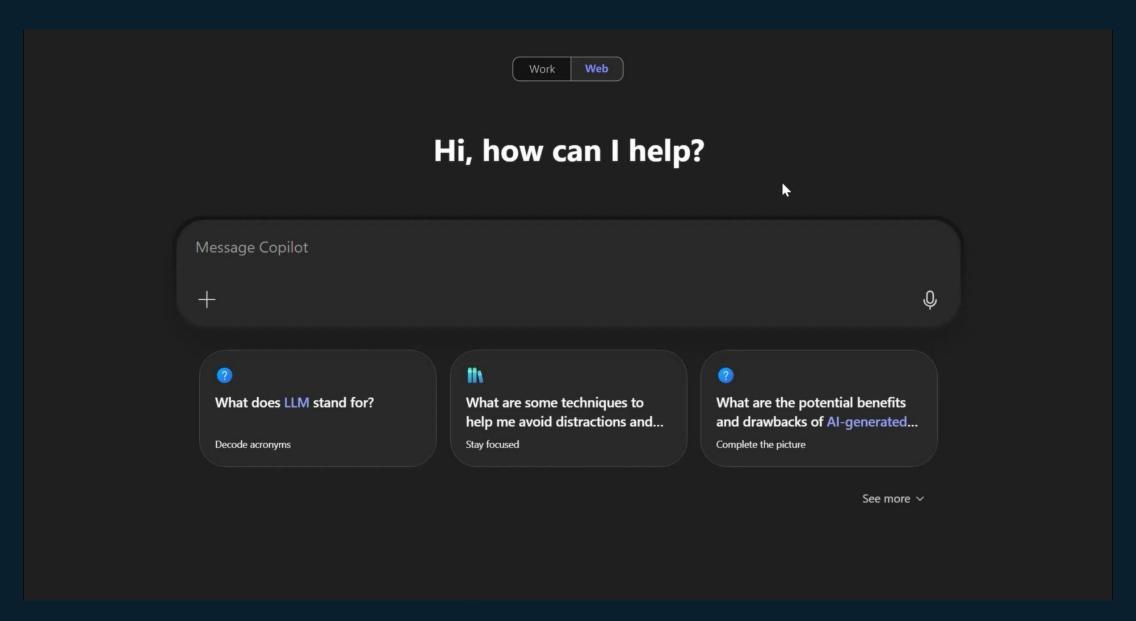
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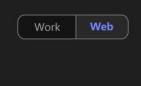
- Total height (including antenna): 443.2 meters Eiffel Tower
- Total height (including antennas): 330 meters

Learn more: <u>1</u>, <u>2</u>, <u>3</u>.









Hi, how can I help?

I'm considering opening a small eco-friendly cafe in Manhattan next year. Can you help me create a business plan that includes market trends, local competition, estimated startup costs, sustainable supplier options, and a basic financial projection?









Decode acronyms



What are some techniques to help me avoid distractions and...

Stay focused



What are the potential benefits and drawbacks of Al-generated...

Complete the picture







I'm considering opening a small eco-friendly café in Manhattan next year. Can you help me create a business plan that includes market trends, local competition, estimated startup costs, sustainable supplier options, and a basic financial projection?



Copilot



I'm considering opening a small eco-friendly café in Manhattan next year. Can you help me create a business plan that includes market trends, local competition, estimated startup costs, sustainable supplier options, and a basic financial projection?



Copilot ①

Here's a comprehensive business plan outline tailored for your eco-friendly café in Manhattan, incorporating market trends, competition, startup costs, sustainable suppliers, and financial projections:

Business Plan: Eco-Friendly Café in Manhattan (2025)

1. Market Trends (2025)

Key trends shaping the café industry:

- Sustainability: Customers demand biodegradable packaging, zero-waste operations, and ethically sourced ingredients 3.
- Plant-Based Menus: Oat, almond, and soy milks are standard; vegan pastries and meals are growing in popularity 4.
- Hyper-Local Sourcing: Cafés are partnering with local farms and micro-roasters 3.
- Tech Integration: Mobile ordering, contactless payments, and loyalty apps are expected.

2. Local Competition

Manhattan has a vibrant café scene. Notable eco-conscious competitors include:

- Felix Roasting Co. Known for sustainable sourcing and unique drinks 5.
- Grounded Coffee House Organic, Rainforest Alliance certified, and plant-filled ambiance 6.
- Merriweather Aussie-style café with organic coffee and healthy food 6.





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2. Local Competition

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- Merriweather Aussie-style café with organic coffee and healthy food 6.

To stand out, focus on:

- Zero-waste operations
- Community engagement (e.g., local art, events)
- Unique menu items (e.g., seasonal vegan specials)

3. Estimated Startup Costs

Based on 2025 data 7 8:

Category	Estimated Cost Range
Losso (Manhattan)	¢E 000 ¢1E 000/month



3. Estimated Startup Costs

Based on 2025 data 7 8:

Category	Estimated Cost Range
Lease (Manhattan)	\$5,000-\$15,000/month
Renovations & Decor	\$20,000–\$100,000
Equipment (espresso machine, etc.)	\$20,000–\$50,000
Initial Inventory	\$5,000–\$10,000
Licenses & Permits	\$1,000–\$3,000
Marketing & Branding	\$5,000–\$15,000
Working Capital (3–6 months)	\$30,000–\$60,000
Total Estimate	\$100,000–\$250,000



4. Sustainable Supplier Options

Here are some eco-conscious suppliers in NYC:

- **Nguyen Coffee Supply** Direct trade Vietnamese coffee, roasted in Brooklyn 9.
- Willa's Oat Milk Climate-positive, whole-oat milk 9.
- Aqua Best NYC Sustainable seafood supplier 10.
- Acme Smoked Fish Family-owned, responsibly sourced fish 11.
- HowGood Offers sustainability data to help you choose ethical ingredients 9.

5. Basic Financial Projection (Year 1)

Metric	Estimate
Monthly Revenue	\$25,000–\$40,000
Monthly Expenses (rent, labor, COGS, etc.)	\$20,000–\$35,000
Monthly Profit (before tax)	\$2,000–\$5,000
Appual Payanua	¢200 000 ¢480 000



5. Basic Financial Projection (Year 1)

Metric	Estimate
Monthly Revenue	\$25,000–\$40,000
Monthly Expenses (rent, labor, COGS, etc.)	\$20,000–\$35,000
Monthly Profit (before tax)	\$2,000–\$5,000
Annual Revenue	\$300,000–\$480,000
Annual Net Profit	\$24,000–\$60,000

Assumes 100-150 customers/day with an average ticket of \$8-\$10.

Would you like help turning this into a formal business plan document or pitch deck? I can also help you



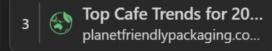
Annual Net Profit \$24,000–\$60,000

Assumes 100-150 customers/day with an average ticket of \$8-\$10.

Would you like help turning this into a formal business plan document or pitch deck? I can also help you model different financial scenarios or design a sustainable menu.



















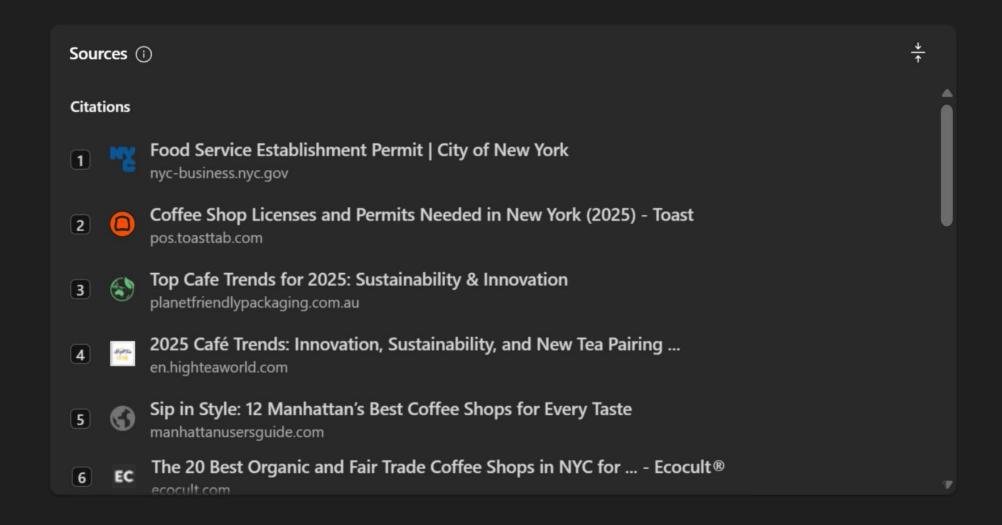


Yes, please help with the formal document.

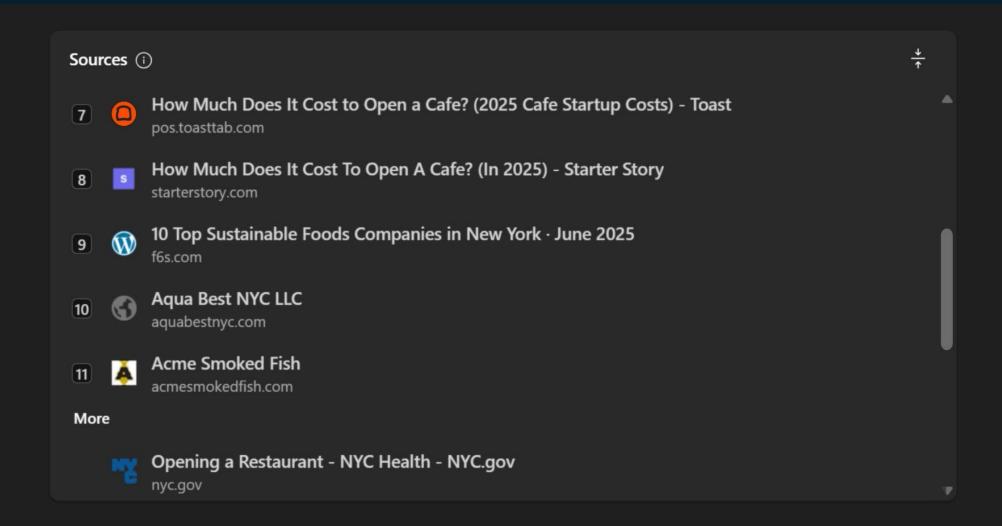
Can you suggest a sustainable menu?



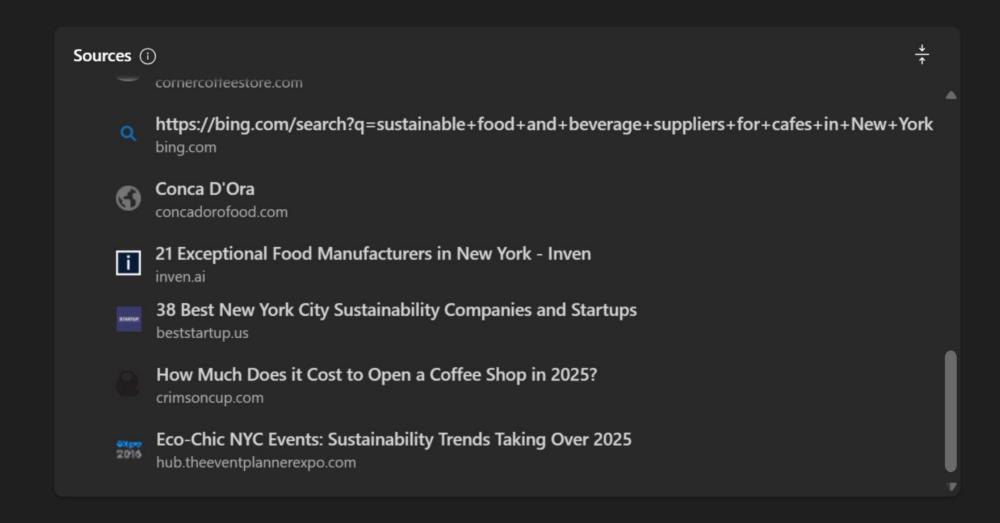






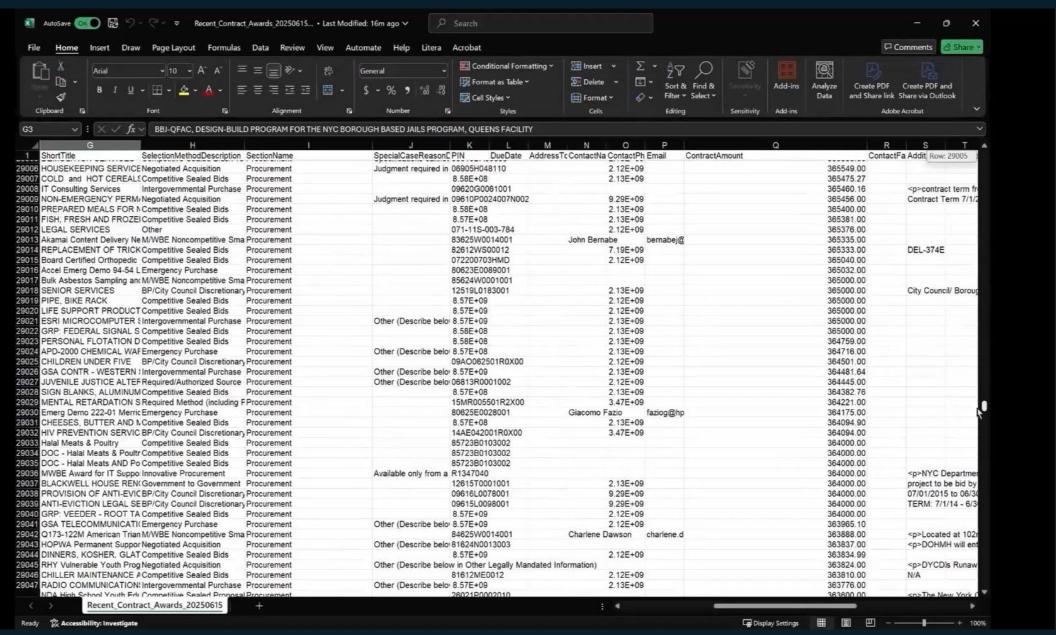






Example 3 – Data Analysis





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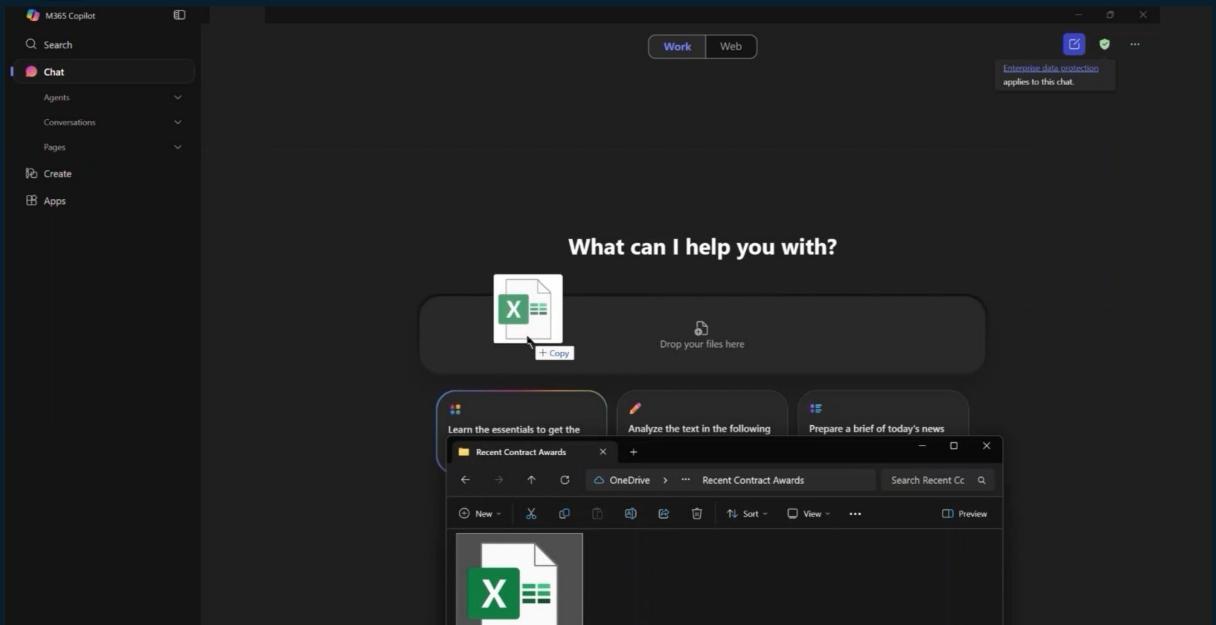
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1 Short		SelectionMethodDescription	SectionName	SpecialCaseReasonD	PIN	DueDate	AddressTc Contac	tNa ContactPh Email	ContractAmount
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49380 In Sci	nool Youth Renewal	Renewal	Procurement		ID Numb	ers Listed		2.12E+09	-1.00
49381 Out-o	f-School Youth Renew	Renewal	Procurement		ID Numb	ers Listed		2.12E+09	-1.00
49382 Youth	Development/Delingu	Renewal	Procurement		See List	Below		2.12E+09	-1.00
49383 Service	es for Senior Citizens	BP/City Council Discretionary	Procurement		See List			2.12E+09	-1.00
		BP/City Council Discretionary			see list b	below		2.12E+09	-1.00
	er Site Housing II Serv		Procurement		06905H0			2.12E+09	-1.00
	er Site Housing Sen		Procurement		06905H0	001800		2.12E+09	-1.00
49387 Perm	anent and Transitiona	Negotiated Acquisition	Procurement	Available only from a				2.12E+09	-1.00
		BP/City Council Discretionary		ritalianic city trent a	see list		2 Lafayett Betty L		-1.00
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	RATION, MANAGEME		Procurement	Other (Describe below				2.13E+09	
		BP/City Council Discretionary				n Line 17		2.12E+09	
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		BP/City Council Discretionary			see list			2.12E+09	
49406 Service	es for Senior Citizens	CP/2	Procurement		see list b	oelow		2.12E+09	
49407 Service	es for Senior Citizens	Renewal	Procurement		see list			2.12E+09	
49408 Service	es for Senior Citizens	CP/2	Procurement		see list			2.12E+09	
49409 Service	es for Senior Citizens	Negotiated Acquisition	Procurement	Judgment required in	see list			2.12E+09	
49410 Service	es for Senior Citizens	Renewal	Procurement		see list			2.12E+09	
49411 Service	es for Senior Citizens	CP/2	Procurement		see list b	below		2.12E+09	
49412 Service	es for Senior Citizens	CP/2	Procurement		see list b	below.		2.12E+09	
49413 Service	es for Senior Citizens	CP/2	Procurement		see list b	below		2.12E+09	
	e For Senior Citizens	N 7 A / N 7 L	Procurement			. Below		2.12E+09	
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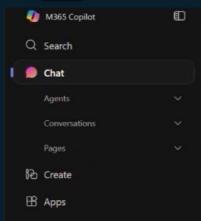




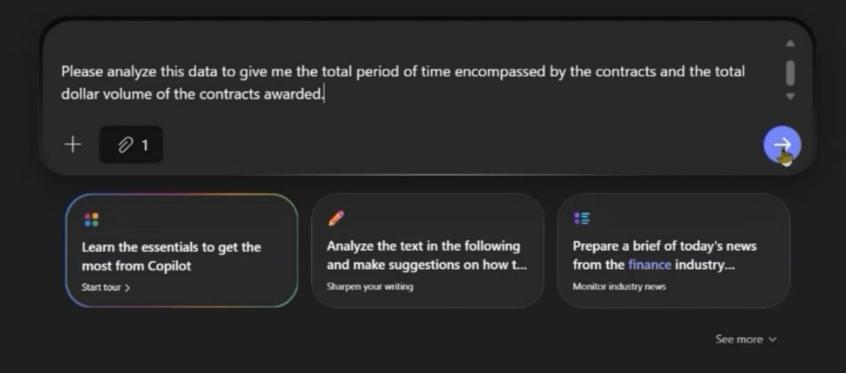




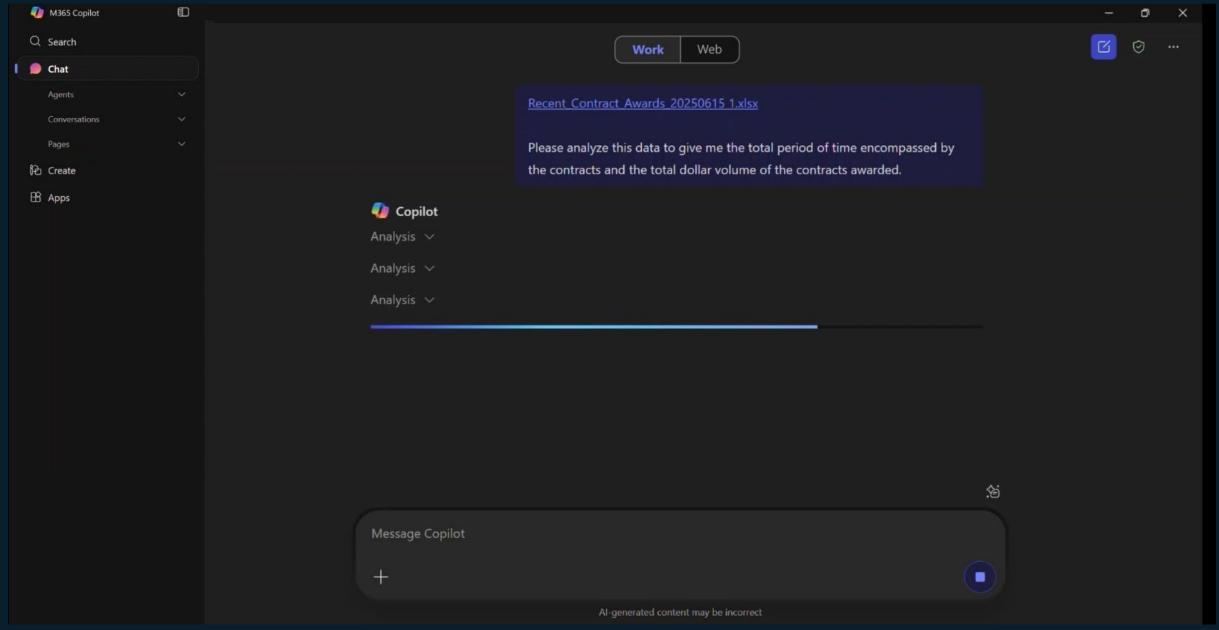




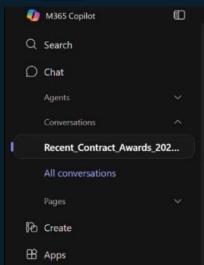
What can I help you with?

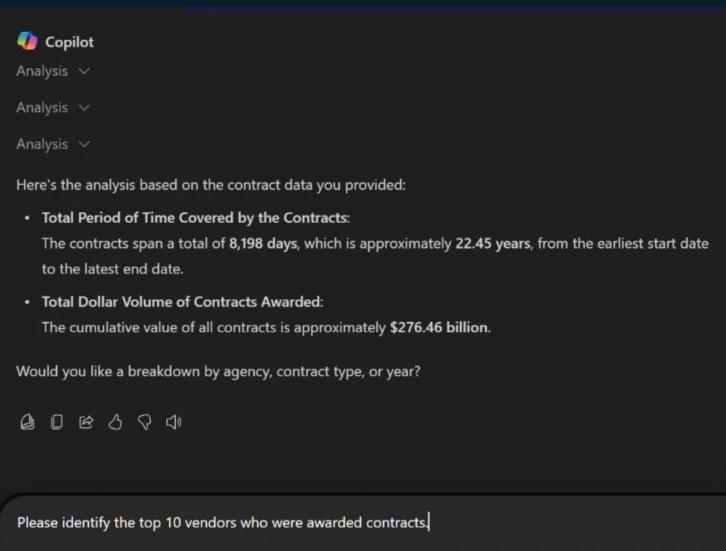








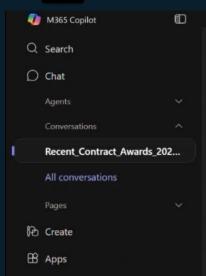












The contracts span a total of **8,198 days**, which is approximately **22.45 years**, from the earliest start date to the latest end date.

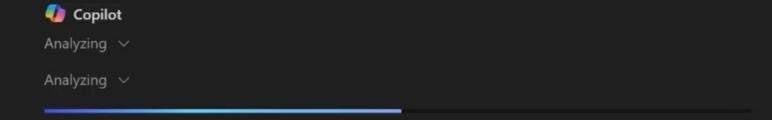
Total Dollar Volume of Contracts Awarded:
 The cumulative value of all contracts is approximately \$276.46 billion.

Would you like a breakdown by agency, contract type, or year?



Please identify the top 10 vendors who were awarded contracts.

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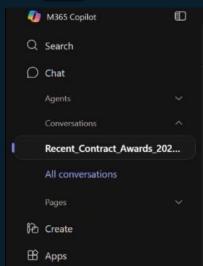


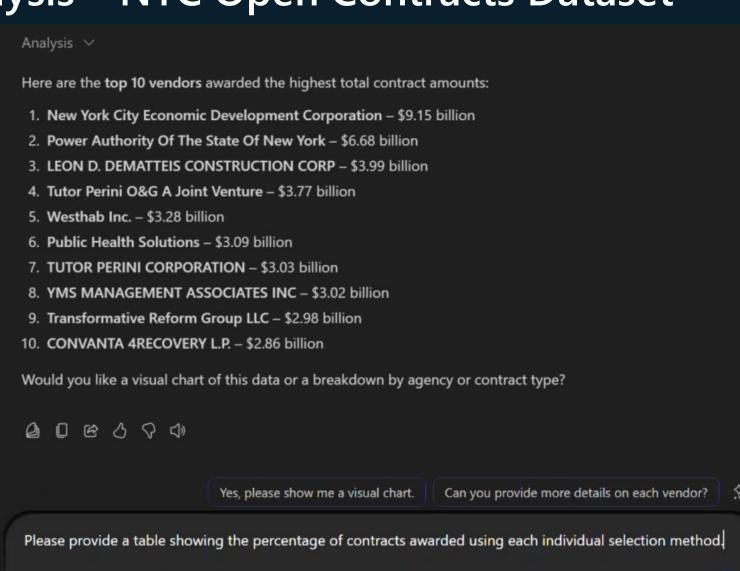
Message Copilot

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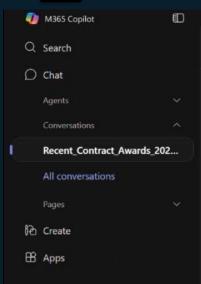


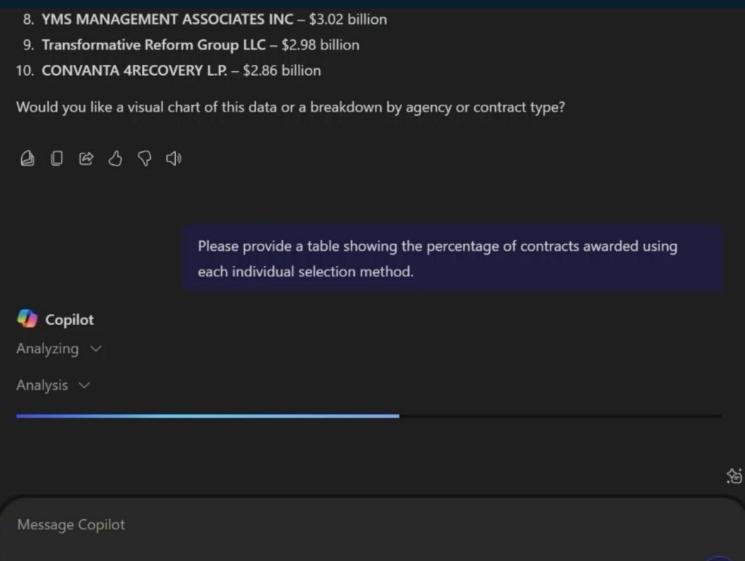






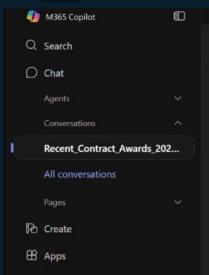
Data Analysis – NYC Open Contracts Dataset





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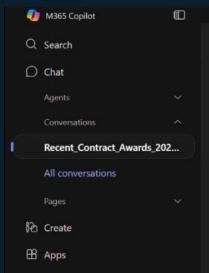


Innovative Procurement	2.75%
Other	2.67%
Competitive Sealed Proposals/Pre-Qualified List	2.45%
Sole Source	2.07%
Required Method (including Preferred Source)	1.93%
Required/Authorized Source	1.55%
Small Purchase	0.83%
Competitive Sealed Bids/Pre-Qualified List	0.67%
Line Item Appropriation or Discretionary Funds	0.61%

Would you like this data visualized in a chart or exported to a file?

Yes, please visualize this data in a chart. Can you export this table to Excel? Message Copilot Al-generated content may be incorrect





Line Item Appropriation or Discretionary Funds	0.61%
CP/2	0.45%
Government to Government	0.33%
Demonstration Project	0.18%
Negotiated Acquisition/Pre-Qualified List	0.18%
Contract Change	0.15%
Public Bid	0.08%
Request for Quote	0.08%
Cooperative Purchasing	0.06%

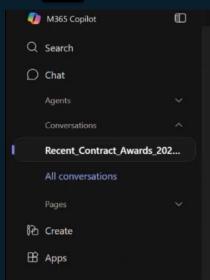
Would you like this data visualized in a chart or exported to a file?

Yes, please visualize this data in a chart. Can you export this table to Excel?

←

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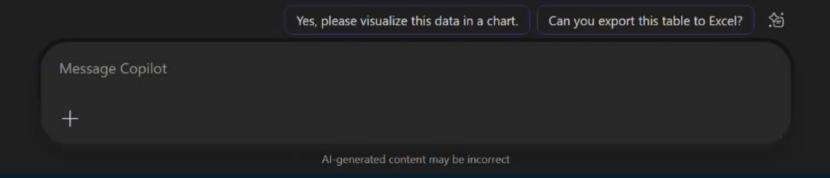




request for Quote	U.U8%
Cooperative Purchasing	0.06%
Contract with another Government	0.06%
IG/S	0.04%
Request for Qualifications	0.01%
RS	0.01%
Request for Information	0.00%
Client Services Waiver	0.00%
Client Services Walver	0.00%

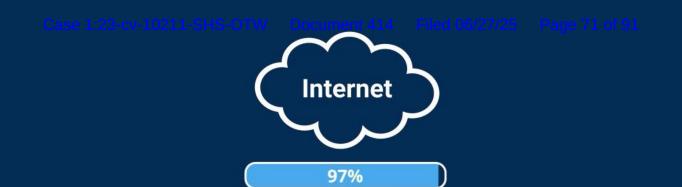
Would you like this data visualized in a chart or exported to a file?





Webmaster Controls

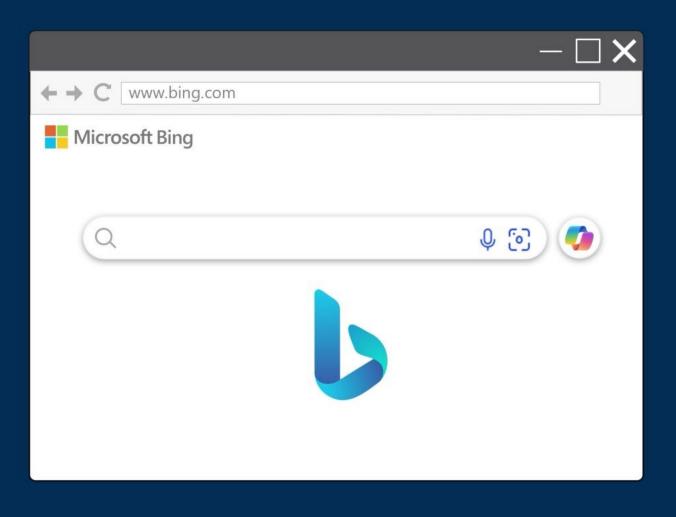




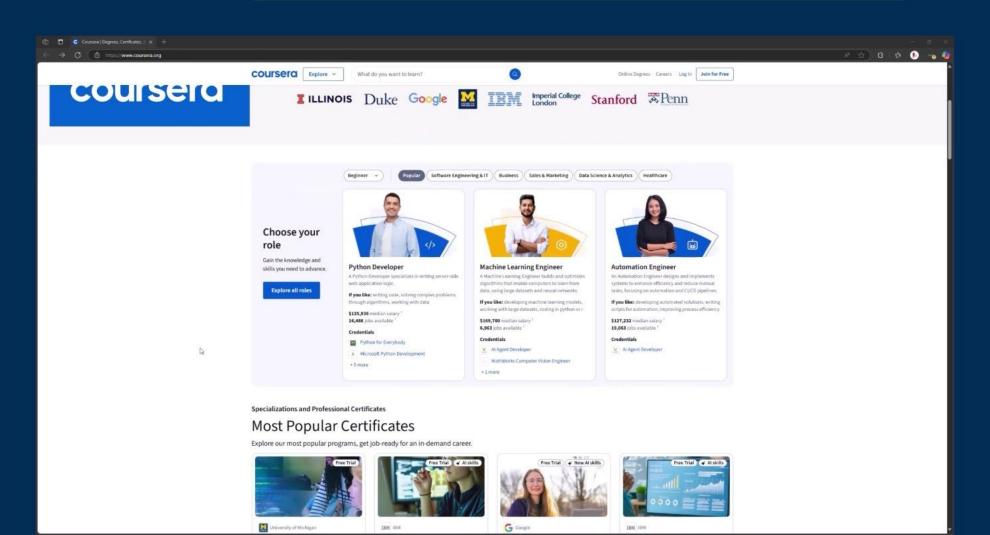




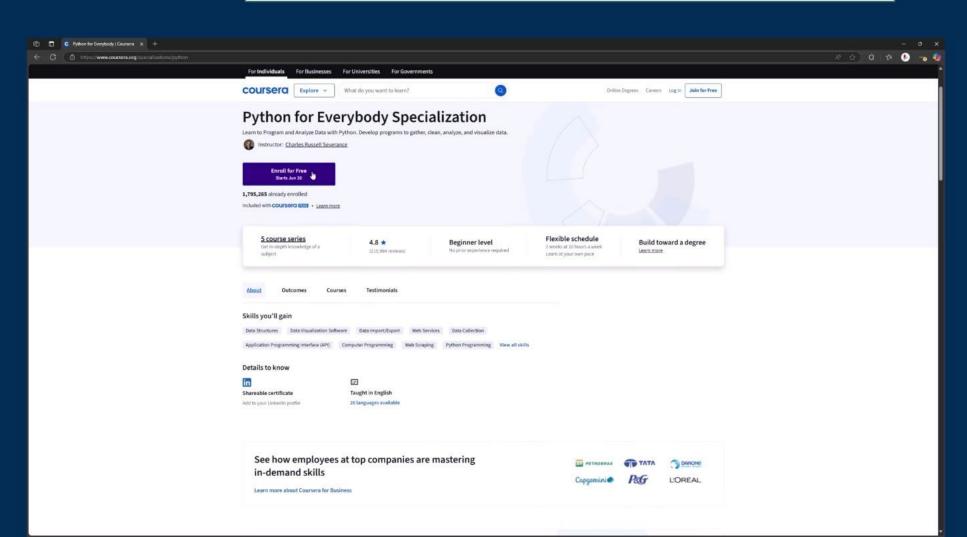




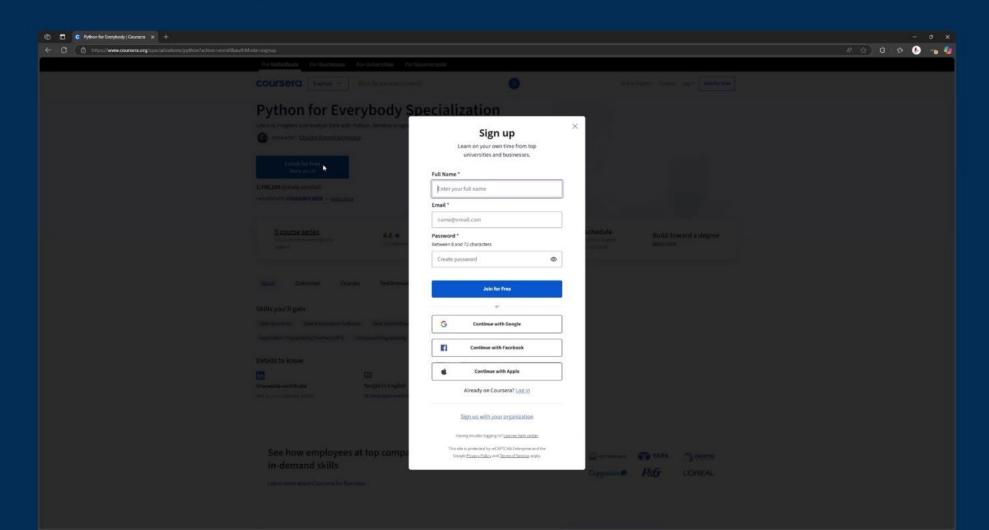
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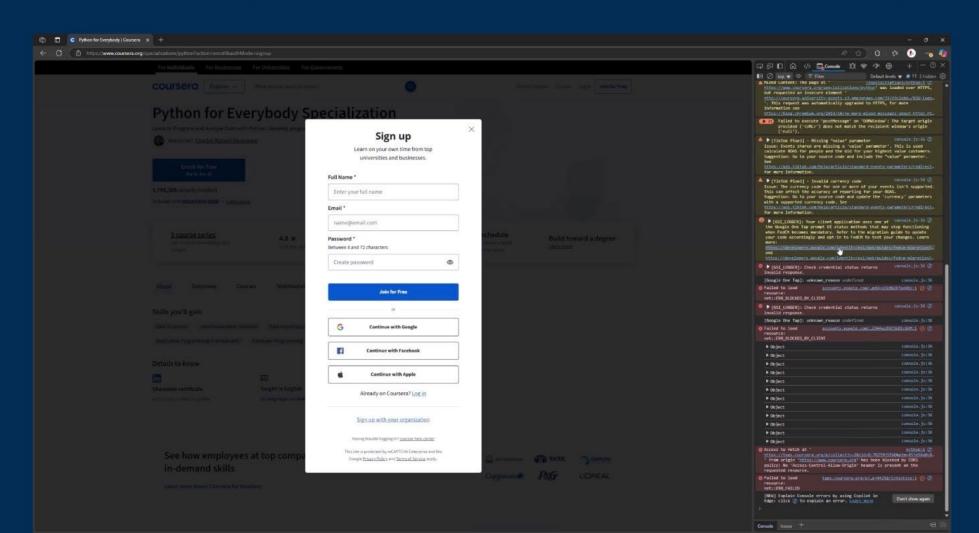




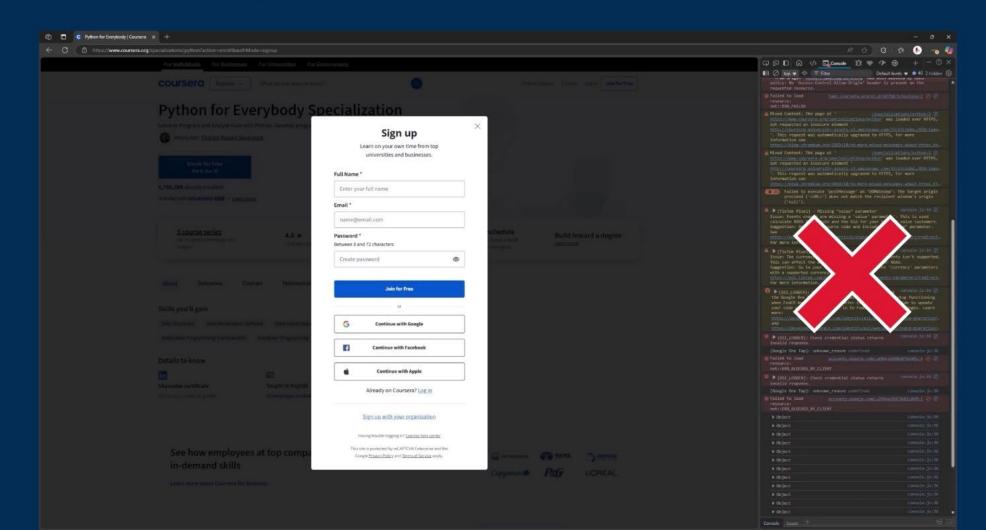
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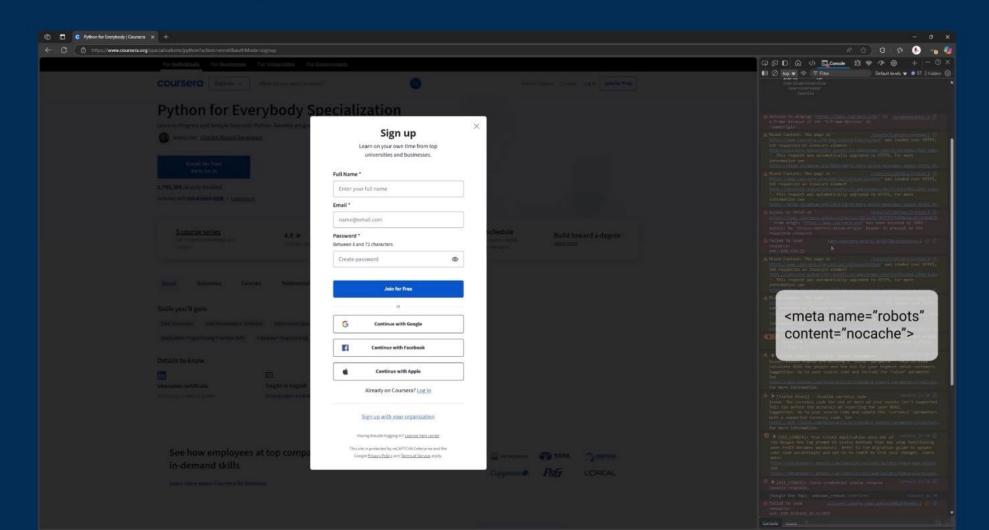
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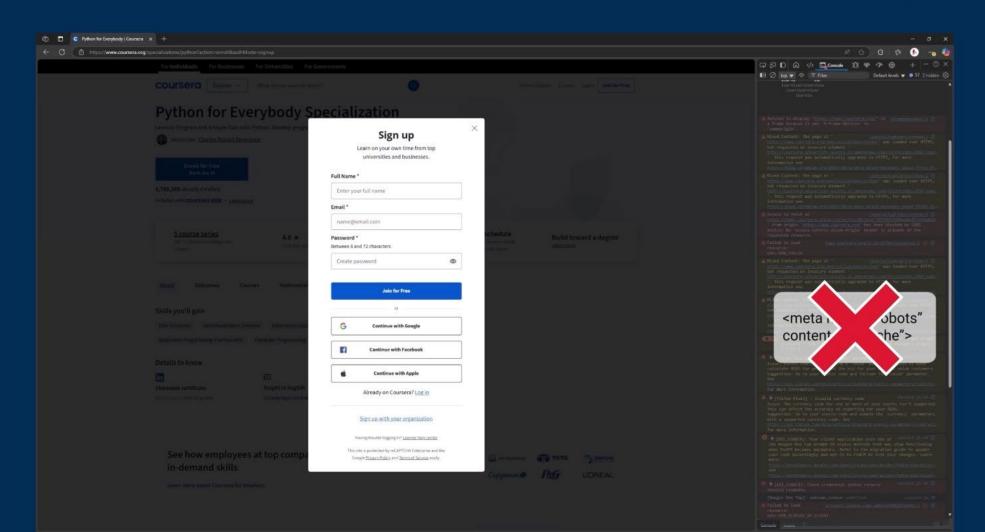
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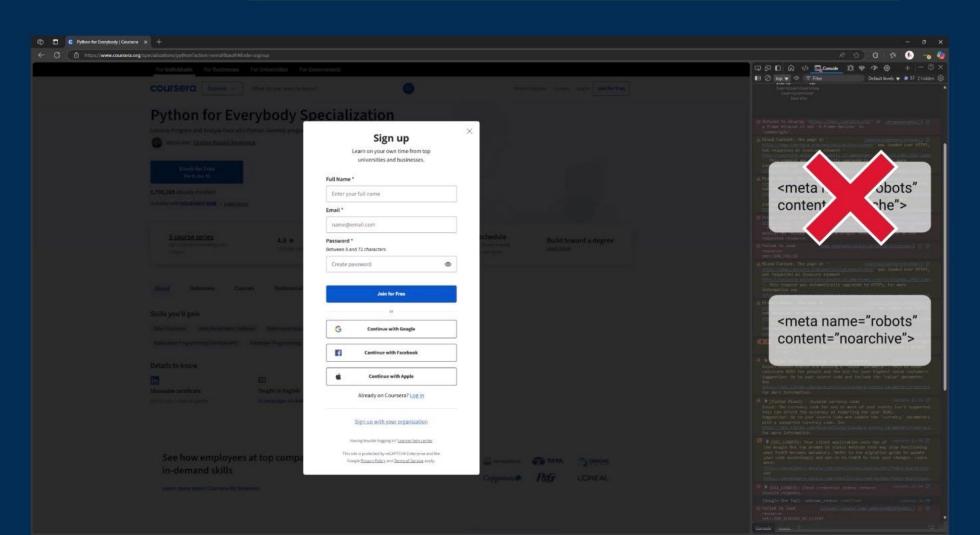
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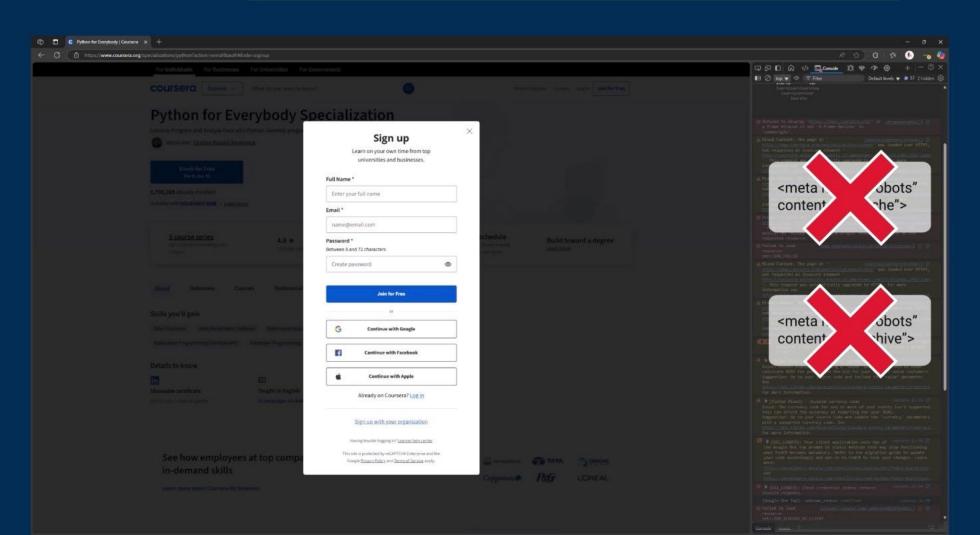
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"29-cv-10211-SH3-OTW Document 414 Filed 00/27/25 Page 82 of 91

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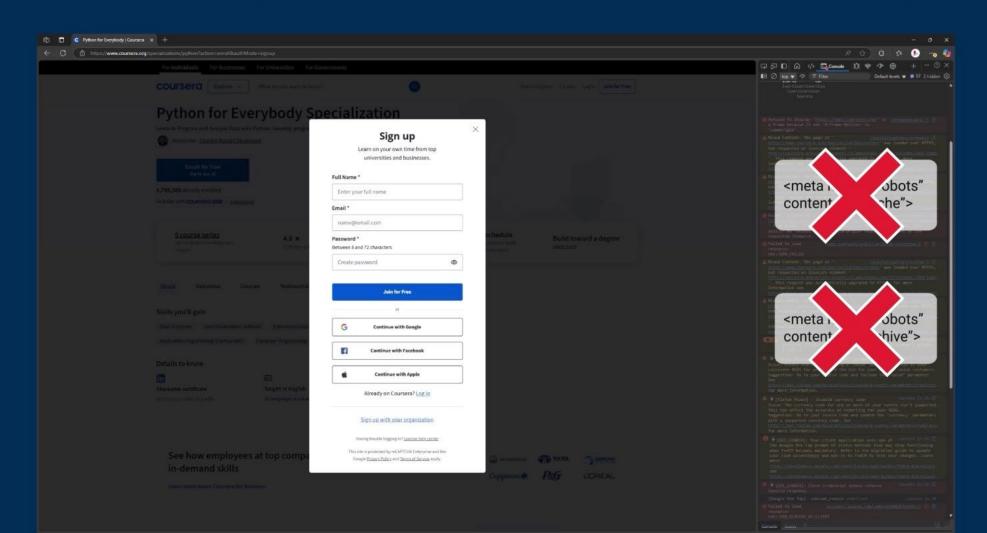
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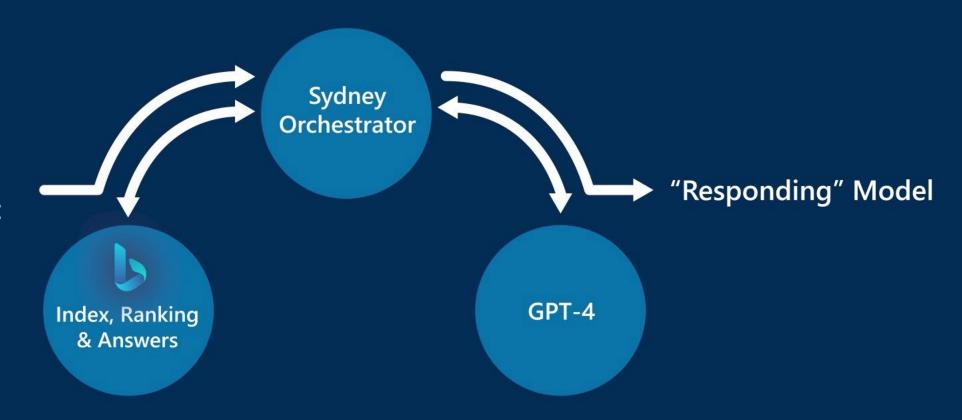
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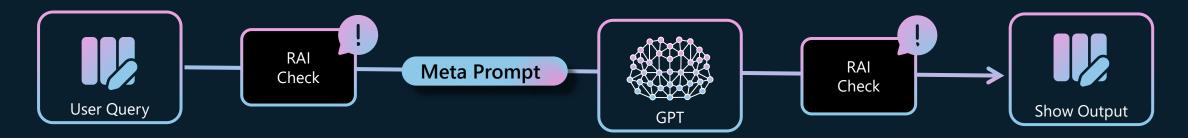


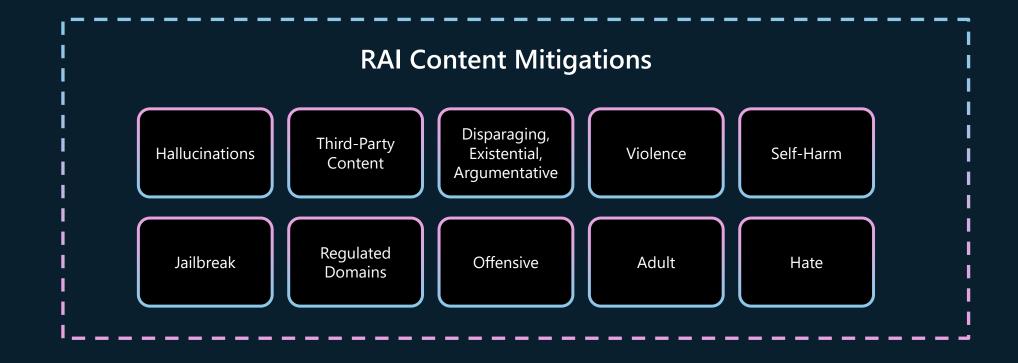
User query & conversation context



Responsible Al

Responsible AI in Practice





M365 Copilot & Bing Chat versus New Consumer Copilot

Significant Differences for Discovery Purposes

Nov. 2023

Bing Chat rebranded

to Copilot

Timeline

Bing Chat

Events

Feb. 2023

Bing Chat launched (GPT-4)

Mar. 2023 GPT-3.5 Turbo

Dec. 27, 2023

NYT Complaint filed

Jan. 2024

GPT-4 Turbo

2023 2024



May 2024

New Consumer Copilot coding begins Oct. 2024

New Consumer Copilot released (GPT-40 & after)

Both Are Mustangs, Very Different Under the Hood





New Consumer Copilot Is Different For Discovery Purposes

New Infrastructure

- New system architecture
- Built on different platform
- Output logs: entirely different system for capture and storage
- Incorporates only latergeneration OpenAl LLMs (not previously in case as to Microsoft)

New Source Code/ Functions

- Entirely new code base stored in different location
- Plaintiffs have already spent ~50 days examining BingChat source code
- New capability to utilize numerous new external functions
- Many new app clients providing native support across multiple surfaces

New Custodians

- Built from scratch between May and October 2024
- Back-end code written by ~300 people
- Only 2 people overlap with BingChat

The Importance of General Purpose Technologies

Single Purpose Technologies

General Purpose Technologies

















GPTs Have Driven The Major Industrial Revolutions

1st Industrial Revolution

2nd Industrial Revolution

3rd Industrial Revolution





